

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE: ANTHONY S NEMBHARD, JR and LAUREN C NEMBHARD	Case No. 20-10906-amc
Freedom Mortgage Corporation, Movant	Chapter 13
vs.	
ANTHONY S NEMBHARD, JR and LAUREN C NEMBHARD, Debtor	11 U.S.C. §362

NOTICE OF MORTGAGE FORBEARANCE DUE TO THE COVID-19 PANDEMIC

NOW COMES Creditor, Freedom Mortgage Corporation (“CREDITOR”), by and through undersigned counsel, and hereby submits Notice to the Court of the forbearance offer with respect to Creditor’s residential mortgage claim which is identified on the Court’s claim register as Claim No. 8 (the “Claim”).

The Claim is eligible for a forbearance period based upon the Debtor(s) material financial hardship caused by the COVID-19 pandemic. As a result, the Debtor(s) shall not be required to tender mortgage payments to Creditor that would come due on the Claim starting 02/01/2021 through 07/31/2021.

Creditor, at this time, does not waive any rights to collect the payments that come due during this forbearance period.

Debtor(s) will resume Mortgage payments beginning 08/01/2021 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”).

Prior to the expiration of the forbearance period, Debtor(s) must either (1) request additional forbearance time under Local Rule, State or Federal Law; (2) enter inter loss mitigation with Creditor; or (3) file an Amended Chapter 13 Plan which cures the arrears resulting from the forbearance period over the remainder of the Chapter 13 Plan.

Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Respectfully Submitted,

/s/ Andrew Spivack

Andrew Spivack

(Bar No. 84439)

Attorney for Creditor

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice Of Mortgage Forbearance Due To The Covid-19 Pandemic has been electronically served or mailed, postage prepaid on March 3, 2021 to the following:

ANTHONY S NEMBHARD, JR
1655 CANARY ROAD
QUAKERTOWN, PA 18951

LAUREN C NEMBHARD
1655 CANARY ROAD
QUAKERTOWN, PA 18951

Mark M. Medvesky, Debtor's Attorney
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Suite 110
Souderton, PA 18964

Scott F. Waterman, Bankruptcy Trustee
Chapter 13 Trustee
2901 St. Lawrence Ave, Suite 100
Reading, PA 19606

United States Trustee, US Trustee
Office of the U.S. Trustee
200 Chestnut Street, Suite 502
Philadelphia, PA 19106

/s/ Andrew Spivack
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